

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re: Asbestos Products Liability Litigation (No. VI); MDL 875

Regarding:  
THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA

ROBERT D. BELUE, et al.,

Plaintiffs,

v.

A.O. SMITH ELECTRICAL PRODUCTS,  
COMPANY, etc., et al.,

Defendants.

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CIVIL ACTION NO.:  
2:06CV1034-WKW-WC

**DEFENDANT KAISER GYPSUM COMPANY, INC.'S  
JOINDER IN MOVING DEFENDANT'S MOTION TO DISMISS,  
OR IN THE ALTERNATIVE, MOTION TO SEVER AND FOR MORE DEFINITE STATEMENT**

Defendant, Kaiser Gypsum Company, Inc., by and through its attorney of record, hereby joins in and adopts by reference as if set forth fully herein, the Motion to Dismiss, or in the Alternative, Motion to Sever and for More Definite Statement and Memorandum of Law filed in support thereof (Doc. 258) filed on behalf of moving Defendant, Sunbeam Products, Inc. In filing this Motion to Dismiss, or in the Alternative, Motion to Sever and for More Definite Statement, Kaiser Gypsum Company, Inc. does not in any way waive any of the grounds set forth in its previously filed Motions to Dismiss, nor does it waive any additional grounds for dismissal as to any Plaintiffs against whom dismissal is sought in this Motion, nor does it waive any grounds against any Plaintiffs against whom dismissal is not specifically sought in this Motion.

Respectfully submitted,

/s/ Vincent A. Noletto, Jr.  
VINCENT A. NOLETTO, JR. (NOLEV3868)  
Attorney for Defendant Kaiser Gypsum  
Company, Inc.

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**CERTIFICATE OF SERVICE**

I hereby certify that I have on this 3<sup>rd</sup> day of June, 2008, served a copy of the above and foregoing by electronic means via the CM/ECF to those registered with the CM/ECF.

/s/ Vincent A. Noletto, Jr.

OF COUNSEL